FINDINGS OF CONFORMANCE
MULTIPLE SPECIES CONSERVATION PROGRAM
Dotts Subdivision
TM 5300, AD 06-047, Log No. 02-04-054

February 19, 2008

I. Introduction

The project is a major subdivision of 38.14 acres into four residential parcels. The project will preserve 20.78 acres on-site within a dedicated Biological Open Space Easement. The project site is located at 6565 Dehesa Road within the Crest/Dehesa/Harbison Canyon/Granite Hills Subregional Plan in unincorporated San Diego County. The site is located approximately 2,700 feet west of the Cleveland National Forest and 1.25 miles northwest of the Loveland Reservoir. The neighboring property to the east is preserved within an existing open space easement.

The project site is undeveloped, and supports steep slopes and areas of dense brush. Riparian forest habitat is present at the northeastern end of the property. The site contains several natural drainages, including a tributary to the North Fork of the Sweetwater River in the northeast corner. Habitats on-site consist of Diegan coastal sage scrub, southern mixed chaparral, southern coast live oak riparian forest, and urban/developed (dirt roads). Four sensitive plant species were observed on site: Palmer's ericameria (Ericameria palmeri ssp. palmeri), San Diego sagewort (Artemisia palmeri), Engelmann oak (Quercus engelmannii), and San Diego viguiera (Viguiera laciniata). Palmer's ericameria (Ericameria palmeri ssp. palmeri) is also an MSCP narrow endemic plant species. Four sensitive wildlife species were observed on site: orange-throated whiptail (Cnemidophorus hyperythrus), bobcat (Lynx rufus), mule deer (Odocoileus hemionus) and Bewick's wren (Thryomanes bewickii). Protocol Quino checkerspot butterfly surveys were performed in 2003 with negative results. The project site is not within a Pre-Approved Mitigation Area in the North Metro-Lakeside-Jamul segment of the County Subarea Plan, but meets the definition of a Biological Resource Core Area (BRCA). The eastern portion of the site likely serves as a wildlife corridor.

The subdivision would directly impact 18.05 acres of the project site through clearing, grading and construction for housing pads, septic fields, fire-clearing, and access roads/driveways. Off-site road improvements are not required. Impact acreages are listed in Table 1. An on-site Open Space Easement and Limited Building Zone Easement will be dedicated to mitigate for a portion of the project's impacts. The remainder of the project's mitigation requirements will be met through off-site habitat purchase, as detailed in the Mitigation Negative Declaration (MND).

Table 1. Impacts to habitat and required mitigation.

Habitat Type	Tier	Existing On-site (ac.)	Proposed Impacts (ac.)	On-site Preservation (ac.)	Mitigation Ratio	Required Mitigation
Diegan Coastal Sage Scrub	II	14.75	9.43	5.32	1.5:1	14.15[1]
Southern Mixed Chaparral	III	23.38	8.38	15.00	1:1	8.38[2]
Southern Coast Live Oak Riparian Forest	I	0.46	0	0.46	N/A	None
Urban/Developed	IV	0.24	0.24	0	none	None
Total:		38.83	18.05	20.78		

[1] 5.32 acres provided on-site. Remaining 8.83 acres to be provided off-site.
[2] On-site preservation exceeds mitigation requirement.

The findings contained within this document are based on County records, staff field site visits and a project-level Biological Resources Report (Vincent Scheidt, April 2007). The information contained within these Findings is correct to the best of staff's knowledge at the time the findings were completed. Any subsequent environmental review completed due to changes in the proposed project or changes in circumstance will require new findings based on the environmental conditions at that time.

The project has been found to conform to the County's Multiple Species Conservation Program (MSCP) Subarea Plan, the Biological Mitigation Ordinance (BMO) and the Implementation Agreement between the County of San Diego, the CA Department of Fish and Game and the US Fish and Wildlife Service. Third Party Beneficiary Status and the associated take authorization for incidental impacts to sensitive species (pursuant to the County's Section 10 Permit under the Endangered Species Act) shall be conveyed only after the project has been approved by the County, these MSCP Findings are adopted by the hearing body and all MSCP-related conditions placed on the project have been satisfied.

II. Biological Resource Core Area Determination

The impact area and the mitigation site shall be evaluated to determine if either or both sites qualify as a Biological Resource Core Area (BRCA) pursuant to the BMO, Section 86.506(a)(1).

A. Report the factual determination as to whether the proposed Impact Area qualifies as a BRCA. The Impact Area shall refer only to that area within

which project-related disturbance is proposed, including any on and/or off-site impacts.

The site qualifies as a BRCA, due to its location adjacent to over 500 acres of undeveloped habitat. In addition, the site is located in the western portion of a habitat linkage and wildlife corridor that connects with a Pre-Approved Mitigation Area (PAMA) to the east and Cleveland National Forest to the southeast. The site contains significant topography and vegetation that provides movement opportunities for all sizes of wildlife. In addition, the northeast corner of the site contains a tributary to the North Fork of the Sweetwater River, which is likely to be used by traveling wildlife.

B. Report the factual determination as to whether the Mitigation Site qualifies as a BRCA.

As a Biological Resource Core Area, the open space resulting from this project is considered part of the regional MSCP preserve system. As such, all of the requirements relating to the "Preserve" outlined in the County's Subarea Plan, the Implementation Agreement and the Final MSCP Plan apply to this open space.

The balance of mitigation requirements will be through offsite mitigation purchase. The mitigation site is considered a BRCA because it will occur within a County-approved mitigation bank or at a site meeting one or more of the BRCA criteria.

III. Biological Mitigation Ordinance Findings

A. Project Design Criteria (Section 86.505(a))

The following findings in support of Project Design Criteria, including Attachments G and H (if applicable), must be completed for all projects that propose impacts to Critical Populations of Sensitive Plant Species (Attachment C), Significant Populations of Narrow Endemic Animal Species (Attachment D), Narrow Endemic Plant Species (Attachment E) or Sensitive Plants (San Diego County Rare Plant List) or proposes impacts within a Biological Resource Core Area.

1. Project development shall be sited in areas to minimize impact to habitat.

Development of the project site will impact Diegan coastal sage scrub and southern mixed chaparral toward the western side of the property. The project will preserve approximately 53% of the site in

a dedicated Biological Open Space easement, thereby minimizing habitat impacts.

2. Clustering to the maximum extent permitted by County regulations shall be considered where necessary as a means of achieving avoidance.

   The four new house sites will be located as close to the west side of the property as possible, given the topographic constraints and steep slope requirements for lot configuration. By locating new house sites toward the western site of the property, a large contiguous block of habitat can be preserved in the east and southeastern portions of the property.

3. Notwithstanding the requirements of the slope encroachment regulations contained within the Resource Protection Ordinance, effective October 10, 1991, projects shall be allowed to utilize design that may encroach into steep slopes to avoid impacts to habitat.

   The property is constrained by steep slopes, and slope encroachment is proposed to avoid impacts to habitat and preserve more resources.

4. The County shall consider reduction in road standards to the maximum extent consistent with public safety considerations.

   The proposed private road in the project is sited in the western portion of the property. Reducing the road width would not result in more open space or less habitat impacts.

5. Projects shall be required to comply with applicable design criteria in the County MSCP Subarea Plan, attached hereto as Attachment G (Preserve Design Criteria) and Attachment H (Design Criteria for Linkages and Corridors).

B. Preserve Design Criteria (Attachment G)

In order to ensure the overall goals for the conservation of critical core and linkage areas are met, the findings contained within Attachment G shall be required for all projects located within Pre-Approved Mitigation Areas or areas designated as Preserved as identified on the Subarea Plan Map.

1. Acknowledge the “no net loss” of wetlands standard that individual projects must meet to satisfy State and Federal wetland goals,

policies, and standards, and implement applicable County ordinances with regard to wetland mitigation.

The property contains a natural drainage in the northeast that qualifies as a County, State and Federal wetland. This entire feature will be preserved in dedicated biological open space. A natural drainage feature in the central and southern portions of the site likely qualifies as a State jurisdictional drainage, but not as a County or Federal wetland. The project will be conditioned to obtain appropriate permits from the U.S. Army Corps of Engineers (ACOE), Regional Water Quality Control Board (RWQCB), and the California Department of Fish and Game (CDFG) prior to construction of the driveway crossing the drainage. Therefore, there will be no net loss of wetlands due to this project.

2. Include measures to maximize the habitat structural diversity of conserved habitat areas, including conservation of unique habitats and habitat features.

   The project will preserve 20.78 acres of on-site open space. The open space will include Diegan coastal sage scrub, southern mixed chaparral, southern coast live oak riparian forest, a Federal/State/County wetland, the entire on-site populations of Palmer's ericameria (*Ericameria palmeri* ssp. *palmeri*), an MSCP narrow endemic species, and two County group D sensitive plants: San Diego sagewort (*Artemisia palmeri*) and Engelmann oak (*Quercus engelmannii*). The project will maximize habitat structural diversity by preserving three sensitive habitats, a wetland, a narrow endemic plant species, two sensitive plant species, and habitat for the four sensitive wildlife species observed onsite.

3. Provide for the conservation of spatially representative examples of extensive patches of Coastal sage scrub and other habitat types that were ranked as having high and very high biological value by the MSCP habitat evaluation model.

   The MSCP habitat evaluation model ranks the site as predominately low and medium value, with a small area of high and very high value along the site's northern edge. The very high value habitat is associated with the drainage in the northeast corner, which will be preserved in dedicated open space. The open space will preserve 5.32 acres of Diegan coastal sage scrub, 15.0 acres of granitic southern mixed chaparral, and 0.46 acres of southern coast live oak riparian forest. Over half of the site's coastal sage scrub is in the western half of the property adjacent to existing

development. Preservation of additional coastal sage scrub on-site is not warranted, as the portions to be impacted would not connect to off-site habitat.

4. Create significant blocks of habitat to reduce edge effects and maximize the ratio of surface area to the perimeter of conserved habitats. Subsequently, using criteria set out in Chapter 6, Section 6.2.3 of the MSCP Plan, potential impacts from new development on biological resources within the preserve that should be considered in the design of any project include access, non-native predators, non-native species, illumination, drain water (point source), urban runoff (non-point source) and noise. County staff shall determine specific measures necessary to contain impacts from a new development project, and thereby, avoid, reduce or mitigate edge effects on the preserve to less than significant levels.

   The on-site open space will connect to undeveloped land to the east and south. There are no edge effects anticipated in these directions. To reduce edge effects from the proposed additional residential lots created by this project, a 100-foot wide Limited Building Zone Easement, temporary fencing (during grading), permanent fencing, and permanent signage will be required adjacent to the Open Space. The Limited Building Zone Easement will prohibit the construction of any habitable structures within 100 feet of the Open Space Easement, therefore precluding the need for future fire-clearing in the Open Space and reducing the noise and lighting levels in the preserve. The project will comply with the San Diego County Watershed Protection, Storm Water Management, and Discharge Control Ordinance (WPO) and the Stormwater Management Plan (James Green, May 5, 2007), which will prevent adverse impacts from runoff to the Open Space.

5. Provide incentives for development in the least sensitive habitat areas.

   The project will conserve the most sensitive habitat areas on-site, the natural drainage in the northeast and the entire on-site population of Palmer's ericameria (*Ericameria palmeri* ssp. *palmeri*), an MSCP narrow endemic species. Although the project will impact some Diegan coastal sage scrub and southern mixed chaparral, the habitat to be impacted is currently subject to edge effects from adjacent off-site development to the west, thereby reducing its long-term biological value.

6. Minimize impacts to narrow endemic species and avoid impacts to core populations of narrow endemic species.

   The project will preserve 20.78 acres of on-site open space. The open space will include the entire on-site populations of Palmer's ericameria (*Ericameria palmeri* ssp. *palmeri*), an MSCP narrow endemic species, and two County group D sensitive plants: San Diego sagewort (*Artemisia palmeri*) and Engelmann oak (*Quercus engelmannii*).

7. Preserve the biological integrity of linkages between BRCAs.

   The site is adjacent to undeveloped lands to the east and south which are also Biological Resource Core Areas. On-site habitat will be preserved, and the on-site Limited Building Zone Easement, fences, and signage will reduce edge effects and ensure the biological viability of the on-site habitat. The on-site habitat will not only be linked to another BRCA, it will also become part of the larger preserve system. Therefore, biological integrity will be preserved.

8. Achieve the conservation goals for covered species and habitats (refer to Table 3-5 of the MSCP Plan).

   The project site supports Palmer's ericameria (*Ericameria palmeri* ssp*. palmeri*), southern mule deer, and orange-throated whiptail, three covered species under the MSCP Plan. The on-site open space will include the entire onsite population of Palmer's ericameria (*Ericameria palmeri* ssp. *palmeri*), an MSCP narrow endemic species. The project will preserve approximately 53% of the site within a dedicated biological open space easement. The onsite preserve will include a natural drainage with topographic variation and tree cover that will support movement and foraging for southern mule deer. The on-site preserve meets the design criteria for linkages and corridors as described below, and will contribute to large blocks of protected lands that will be conserved in a functional manner. Therefore, the project will contribute to achieving the conservation goals for Palmer's ericameria, southern mule deer, and orange-throated whiptail contained in Table 3-5 of the MSCP Plan.

C. Design Criteria for Linkages and Corridors (Attachment H)

For project sites located within a regional linkage and/or that support one or more potential local corridors, the following findings shall be required to protect the biological value of these resources:

1. Habitat linkages as defined by the BMO, rather than just corridors, will be maintained.

   The project site is adjacent to large area of undeveloped privately-owned property to the south and east. The habitat eventually links to Cleveland National Forest and Loveland Reservoir to the south and east. Development of four residential sites will occur in the center and western portions of the site, leaving the east and southeast corner undeveloped. Through preservation of on-site open space, the linkage will remain over 3,000 feet wide in the project vicinity.

2. Existing movement corridors within linkages will be identified and maintained.

   The existing linkage will be maintained through the dedication of a Biological Open Space over the eastern and southeastern portions of the site. This open space will contain a variety of habitats, several natural drainages including a tributary to the North Fork of the Sweetwater River, and significant topographic variation. In addition, the open space will be adjacent to preserved lands to the east and undeveloped lands to the south, allowing unimpeded wildlife movement between the site and adjacent habitats.

3. Corridors with good vegetative and/or topographic cover will be protected.

   The proposed open space will preserve Diegan coastal sage scrub, southern mixed chaparral, and southern coast live oak riparian forest. The open space will also preserve steep slopes in the eastern and southern portion of the site and several natural drainages, which will continue to provide vegetative and topographic cover for wildlife.

4. Regional linkages that accommodate travel for a wide range of wildlife species, especially those linkages that support resident populations of wildlife, will be selected.

By preserving land adjacent to off-site open space to the east and undeveloped lands to the south, the project will contribute to the existing regional linkage, which will continue to accommodate travel for a wide range of resident wildlife populations. Large wildlife such as bobcat and mule deer were observed on-site. By dedicating a large portion of the site as biological open space, the site will continue to support these resident wildlife populations.

5. The width of a linkage will be based on the biological information for the target species, the quality of the habitat within and adjacent to the corridor, topography, and adjacent land uses. Where there is limited topographic relief, the corridor must be well vegetated and adequately buffered from adjacent development.

   The site is part of a linkage that is known to support large mammals. After development of the west and central portions of the site, the linkage will be over 3,000 feet wide in the project vicinity. The land contains a diversity of habitats and significant topographic relief that includes several natural drainages and mature vegetation. The project design includes a 100-foot Limited Building Zone Easement to prevent edge effects from adjacent development.

6. If a corridor is relatively long, it must be wide enough for animals to hide in during the day. Generally, wide linkages are better than narrow ones. If narrow corridors are unavoidable, they should be relatively short. If the minimum width of a corridor is 400 feet, it should be no longer than 500 feet. A width of greater than 1,000 feet is recommended for large mammals and birds. Corridors for bobcats, deer, and other large animals should reach rim-to-rim along drainages, especially if the topography is steep.

   The linkage will maintain a width of greater than 1,000 feet through the project site and the project's open space contribute to this width. The site supports large mammal use, with bobcat and mule deer tracks and scat observed (Vince Scheidt, April 2007). Site development will not significantly narrow the linkage width through this area. The proposed additional residential development will occur toward the western side of the site, leaving the eastern edge and southeastern corner of the site undeveloped. The open space will preserve several natural drainages. The preserved habitat will continue to provide hiding places and movement opportunities for large mammals and birds.

7. Visual continuity (i.e., long lines-of-site) will be provided within movement corridors. This makes it more likely that animals will keep moving through it. Developments along the rim of a canyon used as a corridor should be set back from the canyon rim and screened to minimize their visual impact.

   The site and local area contains significant topography that limits visual continuity. The vegetated slopes and natural drainages to be preserved on-site will provide cover and screening for wildlife, and will connect to existing habitat to the east and south. By locating new development adjacent to current development toward the western side of the site, the existing visual continuity along the eastern portion of the site will be maintained.

8. Corridors with low levels of human disturbance, especially at night, will be selected. This includes maintaining low noise levels and limiting artificial lighting.

   To reduce human disturbance, a 100-foot wide Limited Building Zone Easement will be dedicated adjacent to the Open Space. This Limited Building Zone Easement will prohibit the construction of any habitable structures within 100 feet of the Open Space Easement, reducing the noise and lighting levels in the Open Space preserve.

9. Barriers, such as roads, will be minimized. Roads that cross corridors should have ten foot high fencing that channels wildlife to underpasses located away from interchanges. The length-to-width ratio for wildlife underpasses is less than 2, although this restriction can be relaxed for underpasses with a height of greater than 30 feet.

   The project does not propose roads through the linkage.

10. Where possible at wildlife crossings, road bridges for vehicular traffic rather than tunnels for wildlife use will be employed. Box culverts will only be used when they can achieve the wildlife crossing/movement goals for a specific location. Crossings will be designed as follows: sound insulation materials will be provided; the substrate will be left in a natural condition, and vegetated with native vegetation if possible; a line-of-site to the other end will be provided; and if necessary, low-level illumination will be installed in the tunnel.

One driveway will cross a natural drainage to access the developable area on lot 4. The crossing is designed to allow movement of small wildlife through a 36-inch storm drain pipe. Line of site will be maintained through this straight drain pipe.

11. If continuous corridors do not exist, archipelago (or stepping-stone) corridors may be used for short distances. For example, the gnatcatcher may use disjunct patches of sage scrub for dispersal if the distance involved is less than 1-2 miles.

    Diegan coastal sage scrub, southern mixed chaparral, and southern coast live oak riparian forest will be preserved along the eastern side and southeastern corner of the property. These habitats are adjacent to off-site preserved habitat to the east and undeveloped land to the south. Therefore, the project will preserve a continuous corridor for wildlife movement.

IV. Subarea Plan Findings

Conformance with the objectives of the County Subarea Plan is demonstrated by the following findings:

1. The project will not conflict with the no-net-loss-of-wetlands standard in satisfying State and Federal wetland goals and policies.

   The property contains a natural drainage in the northeast that qualifies as a County, State and Federal wetland. This entire feature will be preserved in dedicated biological open space. A natural drainage feature in the central and southern portions of the site likely qualifies as a State jurisdictional drainage, but not as a County or Federal wetland. The project will be conditioned to obtain appropriate permits from the U.S. Army Corps of Engineers (ACOE), Regional Water Quality Control Board (RWQCB), and the California Department of Fish and Game (CDFG) prior to construction of the driveway crossing the drainage. Therefore, there will be no net loss of wetlands due to this project.

2. The project includes measures to maximize the habitat structural diversity of conserved habitat areas including conservation of unique habitats and habitat features.

   The project will preserve 20.78 acres of on-site open space. The open space will include Diegan coastal sage scrub, southern mixed chaparral, southern coast live oak riparian forest, a Federal/State/County wetland, the entire onsite populations of Palmer's ericameria (*Ericameria palmeri* ssp. *palmeri*), an MSCP narrow endemic species, and two County group D

sensitive plants: San Diego sagewort (*Artemisia palmeri*) and Engelmann oak (*Quercus engelmannii*). The project will maximize habitat structural diversity by preserving three sensitive habitats, a wetland, a narrow endemic plant species, two sensitive plant species, and habitat for the four sensitive wildlife species observed on-site.

3. The project provides for conservation of spatially representative examples of extensive patches of Coastal sage scrub and other habitat types that were ranked as having high and very high biological values by the MSCP habitat evaluation model.

   The MSCP habitat evaluation model ranks the site as predominately low and medium value, with a small area of high and very high value along the site's northern edge. The very high value habitat is associated with the drainage in the northeast corner, which will be preserved in dedicated open space. The open space will preserve 5.32 acres of Diegan coastal sage scrub, 15.0 acres of granitic southern mixed chaparral, and 0.46 acres of southern coast live oak riparian forest. Over half of the site's coastal sage scrub is in the western half of the property adjacent to existing development. Preservation of additional coastal sage scrub on-site is not warranted, as the portions to be impacted would not connect to off-site habitat.

4. The project provides for the creation of significant blocks of habitat to reduce edge effects and maximize the ratio of surface area to the perimeter of conserved habitats.

   The on-site open space will connect to undeveloped land to the east and south. There are no edge effects anticipated in these directions. To reduce edge effects from the proposed additional residential lots created by this project, a 100-foot wide Limited Building Zone Easement, temporary fencing (during grading), permanent fencing, and permanent signage will be required adjacent to the Open Space. The Limited Building Zone Easement will prohibit the construction of any habitable structures within 100 feet of the Open Space Easement, therefore precluding the need for future fire-clearing in the Open Space and reducing the noise and lighting levels in the preserve. The project will comply with the San Diego County Watershed Protection, Storm Water Management, and Discharge Control Ordinance (WPO) and the Stormwater Management Plan (James Green, May 5, 2007), which will prevent adverse impacts from runoff to the Open Space.

5. The project provides for the development of the least sensitive habitat areas.

The project will conserve the most sensitive habitat areas on-site, the natural drainage in the northeast and the entire onsite population of Palmer's ericameria (*Ericameria palmeri* ssp. *palmeri*), an MSCP narrow endemic species. Although the project will impact some Diegan coastal sage scrub and southern mixed chaparral, the habitat to be impacted is currently subject to edge effects from adjacent off-site development to the west, thereby reducing its long-term biological value.

6. The project provides for the conservation of key regional populations of covered species, and representations of sensitive habitats and their geographic sub-associations in biologically functioning units.

   The project will avoid impacts to the onsite MSCP narrow endemic species Palmer's ericameria (*Ericameria palmeri* ssp*. palmeri*). Preservation of several natural drainages will also preserve two other onsite sensitive plant species, Englemann oak and San Diego sagewort. The Open Space Easement will contain Diegan coastal sage scrub, southern mixed chaparral, and southern coast live oak riparian forest. The on-site preserve will be contiguous with a large amount of off-site habitat and will therefore contribute to the preservation of the biological functions of this habitat, which is likely to support covered species. In addition, the project will purchase offsite habitat to meet the balance of its mitigation requirements. Off-site mitigation will contribute in the preservation of large blocks of land containing sensitive habitats in biologically-functioning units.

7. Conserves large interconnecting blocks of habitat that contribute to the preservation of wide-ranging species such as Mule deer, Golden eagle, and predators as appropriate. Special emphasis will be placed on conserving adequate foraging habitat near Golden eagle nest sites.

   The project site is part of a large block of habitat that functions as a regional wildlife linkage. Project development will not significantly narrow the linkage along the length of the project site, and the open space will ensure the maintenance of a linkage width of at least 3,000 feet that will continue to support the movement of large mammals and predators. The site is located along the northern boundary of a known golden eagle territory, although not within a nest site core area or primary foraging area. The on-site habitat preserve will continue to provide foraging habitat for this species. The additional residences toward the western portion of the site will not significantly reduce foraging areas for local golden eagles, as it will be adjacent to existing residences and will not encroach significantly into the undeveloped habitat on-site.

8. All projects within the San Diego County Subarea Plan shall conserve identified critical populations and narrow endemics to the levels specified in the Subarea Plan. These levels are generally no impact to the critical populations and no more than 20 percent loss of narrow endemics and specified rare and endangered plants.

   The project will preserve 20.78 acres of on-site open space. The open space will preserve the entire onsite populations of Palmer's ericameria (*Ericameria palmeri* ssp. *palmeri*), an MSCP narrow endemic species, and two County group D sensitive plants: San Diego sagewort (*Artemisia palmeri*) and Engelmann oak (*Quercus engelmannii*).

9. No project shall be approved which will jeopardize the possible or probable assembly of a preserve system within the Subarea Plan.

   The biological resources onsite are connected to an existing open space preserve to the east and a large block of undeveloped habitat to the south. The western boundary of the project site is adjacent to existing residential development. Development of four additional residential sites adjacent to existing residential development will not jeopardize assembly of the preserve system.

   The project site contains a population of narrow endemic species and several natural drainages. The narrow endemic species and the on-site drainage in the northeast corner will be completely preserved. The project will contribute to the assembly of a preserve system through on-site preservation that conforms to MSCP project design criteria as described in findings III.A, III.B, and III.C.

10. All projects that propose to count on-site preservation toward their mitigation responsibility must include provisions to reduce edge effects.

    To reduce edge effects from the residential lots created by this project, permanent fencing and signage will be required as well as a 100-foot wide Limited Building Zone Easement adjacent to the Open Space. The Limited Building Zone Easement will prohibit the construction of any habitable structures within 100 feet of the Open Space Easement, thereby reducing noise and lighting levels associated with structures and precluding the need for future fire-clearing in the Open Space. Compliance with the San Diego County Watershed Protection, Storm Water Management, and Discharge Control Ordinance (WPO) will prevent adverse impacts from runoff to the Open Space.

11. Every effort has been made to avoid impacts to BRCAs, to sensitive resources, and to specific sensitive species as defined in the BMO.

As the site is a BRCA and part of an existing wildlife linkage, project design includes preservation of approximately 53% of the land in a dedicated Open Space easement. The proposed development will be located toward the western side of the site, adjacent to existing development. A Limited Building Zone Easement, permanent fencing and permanent signage will be required to reduce edge effects from future residential uses. The project has made every effort to avoid impacts to BRCAs, sensitive resources and sensitive species because it will conserve the most sensitive habitat areas on-site: a Federal/State/County wetland, the entire on-site populations of Palmer's ericameria (*Ericameria palmeri* ssp*. palmeri*), an MSCP narrow endemic species, and two County group D sensitive plants: San Diego sagewort (*Artemisia palmeri*) and Engelmann oak (*Quercus engelmannii*). The project proposes development in an area subject to the greatest existing edge effects from existing off-site development. The proposed biological open space is the largest and least fragmented design practicable because it connects to existing open space to the east and large areas of undeveloped habitat to the south.

Four sensitive wildlife species and four sensitive plant were observed on-site. The on-site open space preserve will include Diegan coastal sage scrub, granitic southern mixed chaparral, and southern coast live oak riparian forest. This on-site preserve will provide habitat for sensitive species that may colonize the land and/or use the wildlife linkage in the future. In addition, the project will purchase off-site habitat to meet the balance of its mitigation requirements in accordance with the BMO. Off-site mitigation will contribute in the preservation of large blocks of land containing sensitive habitats in biologically-functioning units. Through project design and mitigation conditions, the project has reduced its impacts to the BRCA, sensitive resources and sensitive species.

Christine Stevenson, Department of Planning and Land Use
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MSCP Designation For
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